



July 24, 2009

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Amendment of Parts 2 and 95 of the Commission's Rules to Provide Additional
Spectrum for the Medical Device Radiocommunication Service in the 413-457 MHz
Band (ET Dkt. No. 09-36; RM-11404)

Dear Ms. Dortch:

Quallion LLC ("Quallion") eagerly supports expeditious Commission action to encourage deployment of medical micro-power network ("MMN") devices in the 413-457 MHz band.

Quallion is largest manufacturer of customized lithium ion batteries in the United States. Quallion designs, fabricates and manufactures state-of-the-art lithium ion cells and battery packs, and develops new battery chemistries for the medical and other industries. Building on our legacy leadership position in the medical device industry, the company has developed a range of novel enabling technologies that include the world's smallest implantable secondary battery and the proprietary Zero-VoltTM and SaFE-LYTETM technologies.

Our lithium ion cells have been qualified to power a number of implantable medical devices, including those in the treatment of neuromuscular injuries and conditions. We are keenly aware of the tremendous physical, psychological, and financial burdens imposed by these injuries and conditions. Currently, the available medical treatment options are limited, and the demand for better, more effective options continues to grow as these injuries and conditions take their toll on an increasing number of people and their families and friends.

We are aware that the Alfred Mann Foundation ("AMF") has been developing MMN devices that could be invaluable in the treatment of various neuromuscular injuries and conditions. We believe that MMN technology provides a unique wireless approach that is unlike any commercially available medical treatment option. This technology, if successfully implemented, will revolutionize the medical treatment and therapy for millions of people suffering from debilitating neuromuscular injuries and conditions.

If there is even a small chance that this groundbreaking technology can deliver on a fraction of its promises, the Commission should dedicate the resources necessary to allow the technology to realize its full potential. We urge the Commission to allocate the full amount of spectrum requested by AMF for MMN use and to adopt service and technical rules permitting MMN operation.

Sincerely,

Hisashi Tsukamoto
Chief Executive Officer